

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Automotive Technology Systems, LLC  
Attn: Tim Walston  
100 Trim Masters Drive  
Lawrenceville, Illinois 62439

Application No.: 03120061

I.D. No.: 101015AAT

Applicant's Designation:

Date Received: March 17, 2006

Subject: Interior Auto Parts Manufacturing

Date Issued: April 25, 2006

Expiration Date: December 1, 2009

Location: 100 Trim Masters Drive, Lawrenceville

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 4 spray booths with filters (base, fabric, power window, manual window) painting touch-up area, 4 spray booths with filters (vacuum forming, front, rear, and leather assy), emergency diesel generator and fire pump, natural gas space heaters and 2 diesel fuel storage tanks and plastic injection molding with 3 storage silos as described in the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit emissions from the source to less than major source thresholds, (i.e., to less than 100 tons per year of volatile organic material (VOM), 25 tons per year for combined HAPs and 10 tons per year for each single HAP), as further described in Attachment A. As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
- b. Prior to the initial issuance of this permit, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K: Use of Organic Material, shall apply only to photochemically reactive material.

- b. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.
- 3a. Emissions and operation of the generator, and fire pump shall not exceed the following limits:

Operating Hours (Hours/Yr)	NO <sub>x</sub>		CO		SO <sub>2</sub>		VOM	
	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
500	1.9	19.2	0.4	4	0.16	1.6	0.09	0.9

These limits are based on maximum generator rating of 2,867 Hp, standard AP-42 emission factors from Sections 3.3 and 3.4, and 0.3 percent sulfur content to show compliance with 35 Ill. Adm. Code 214.122(b)(2). Compliance shall be determined from a running total of the previous 12 months data.

- b. Emissions and operation of the space heaters shall not exceed the following limits:

Total Heat Input (mmBtu/Hr)	NO <sub>x</sub>		CO		VOM	
	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
20	0.9	8.6	0.7	7.2	0.05	0.5

4. At the above location, the Permittee shall not keep, store, or utilize:
- a. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values:
- 0.28 weight percent, or
  - The wt. percent given by the formula: Maximum wt. percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).
5. Organic liquid by-products or waste materials shall not be used in any fuel combustion emission source without written approval from the Illinois EPA.
6. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 7a. The Permittee shall notify the Illinois EPA prior to any change in the type of fuel used at the source.
- b. Natural gas and distillate fuel oil shall be the only fuel(s) fired in the above referenced space heaters, and generator and fire pump, respectively.

8. Emissions and operation of the 8 spray booths, including clean-up, shall not exceed the following:

	Volatile Organic Material (VOM) Usage and Emissions	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
4 Booths (Base, Fabric, Power and Manual Window)	1.7	16.5
4 Booths (Vacuum Forming, Front, Rear and Leather Assy)	6.5	64.4

These limits define the potential emissions and are based on maximum material usage rates, material reclaimed and shipped off-site, VOM content, and continuous operation (8,760 hr/yr). Compliance with annual limits shall be determined from a running total of 12 months of data.

- 9a. This permit is issued based on negligible emissions of VOM from plastic injection molding with 3 storage silos. For this purpose, emissions from these units shall not exceed a total of 0.1 lb/hour and 0.44 tons/year.
- b. This permit is issued based on negligible emissions of VOM from the 2 diesel fuel storage tanks. For this purpose, emissions from these units shall not exceed a total of 0.1 lb/hour and 0.44 tons/year.
- 10a. VOM usage and emissions of the paint touch-up area, including clean-up, shall not exceed 0.13 tons/month and 1.3 tons/year. This is based on maximum paint usage and VOM contents. Compliance with annual limits shall be determined from a running total of 12 months of data.
- b. This permit is issued based on negligible emissions of particulate matter (PM) from the use of all materials. For this reason, emissions shall not exceed nominal rates of 0.1 lb/hr and 0.44 tons/year.
- 11a. Emissions and operation of the 180L Panel Line paint spray booth shall not exceed the following limits:

E M I S S I O N S							
		VOM	HAP			Total	HAP*
Adhesive Usage		Content	Content	VOM			
<u>Ton/Mo</u>	<u>Ton/Yr</u>	<u>Wt. %</u>	<u>Wt. %</u>	<u>Ton/Mo</u>	<u>Ton/Yr</u>	<u>Ton/Mo</u>	<u>Ton/Yr</u>
1.3	12.5	72	20	0.9	9.0	0.3	2.5

\*Total HAP includes N-hexane, methyl alcohol, and toluene.

These limits define the potential emissions of VOM and are based on maximum material usages, individual VOM content, VOM usage and annual operating hours of each material as provided in the permit application.

Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on negligible emissions of particulate matter from the 180 Panel Line paint spray booth. For this purpose, emissions shall not exceed nominal rates of 0.1 lb/hour and 0.44 ton/year.
- 12. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons per year of any single HAP and 25 tons per year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit and Section 112(g) of the Clean Air Act.
- 13a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. The Permittee shall maintain records of the following items for the source:
  - i. Amounts of adhesives and hardeners purchased (tons/month and tons/year);

- ii. VOM and HAP contents of all adhesives and hardeners (weight %);
  - iii. Amount of waste reclaimed and shipped off-site and VOM and HAP contents (tons/month and tons/year, weight %);
  - iv. Operating hours of generator fire pump (hours/year);
  - v. Sulfur content of diesel fuel (% by weight);
  - vi. Touch-up paint used (tons/month and tons/year);
  - vii. VOM and HAP contents of touch-up paint (weight %);
  - viii. Clean-up solvent used (tons/month and tons/year); and
  - ix. VOM, HAP and NO<sub>x</sub> emissions with supporting calculations (tons/month and tons/year).
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
14. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
15. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

Page 6

It should be noted that this permit has been revised to include operation of the equipment described in Construction Permit 06030055.

If you have any questions on this, please call Jocelyn Stakely at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:JRS:psj

cc: Illinois EPA, FOS, Region 3  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the interior auto parts manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant (this is handling 200 tons/yr of adhesives and hardeners and 500 operating hours/yr for a 2,867 Hp generator). The resulting maximum emissions are below the levels, (e.g., 25 tons per year of hazardous air pollutants (HAPs), 10 tons per year of each single HAP and 100 tons per year of volatile organic material (VOM)) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

	E M I S S I O N S (Tons/Year)						HAPs	
<u>Equipment</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>SO<sub>2</sub></u>	<u>PM</u>	<u>VOM</u>	<u>Single</u>	<u>Combined</u>	
4 Booths (Base, Fabric, Power and Manual Window)					16.5			
4 Booths (Vacuum Forming, Front, Rear and Leather Asst.)					64.4			
Generator, Fire Pump and Space Heaters, 2 Diesel Storage Tanks	19.4	4.0	1.6		1.8			
Paint Touch-Up Area					1.3			
Plastic Injection Molding with 3 Storage Silos					0.44			
180L Panel Line Paint Spray Booth					9.00	2.5	2.5	
Totals:	19.4	4.0	1.6	0.44	93.44	< 10	< 25	

JRS:psj